

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA,  
GREATER WACO CHAMBER OF  
COMMERCE, LONGVIEW CHAMBER  
OF COMMERCE, NATIONAL  
ASSOCIATION OF CHEMICAL  
DISTRIBUTORS D/B/A ALLIANCE FOR  
CHEMICAL DISTRIBUTION,  
ASSOCIATED BUILDERS AND  
CONTRACTORS, INC., ASSOCIATED  
GENERAL CONTRACTORS OF  
AMERICA, INTERNATIONAL  
FRANCHISE ASSOCIATION INC.,  
INTERNATIONAL WAREHOUSE  
LOGISTICS ASSOCIATION,  
NATIONAL ASSOCIATION OF  
MANUFACTURERS, NATIONAL  
ASSOCIATION OF WHOLESALE-  
DISTRIBUTORS, NATIONAL  
FEDERATION OF INDEPENDENT  
BUSINESS, INC., NATIONAL RETAIL  
FEDERATION,

*Plaintiffs,*

*v.*

OCCUPATIONAL SAFETY AND  
HEALTH ADMINISTRATION, UNITED  
STATES DEPARTMENT OF LABOR,  
JULIE A. SU, in her official capacity as  
Acting Secretary of Labor, and  
DOUGLAS L. PARKER, in his official  
capacity as Assistant Secretary of Labor  
for Occupational Safety and Health,

*Defendants.*

No. 6:24-cv-00271-ADA-DTG

**UNOPPOSED MOTION TO  
WITHDRAW APPEARANCE  
OF BRETT A. SHUMATE AND  
SUBSTITUTE COUNSEL**

Pursuant to Local Rule AT-3, Plaintiffs submit this unopposed motion to withdraw Brett A. Shumate as *Pro Hac Vice* counsel in this matter. Mr. Shumate is leaving Jones Day, and Plaintiffs respectfully request that he be withdrawn as counsel.

Plaintiffs also ask the Court to grant the substitution of the following counsel:

Anthony J. Dick  
ajdick@jonesday.com  
JONES DAY  
51 Louisiana Ave., N.W.  
Washington, D.C. 20001-2113  
(202) 879-7679

Copies of all notices and pleadings in this action should be provided to and served upon Anthony Dick of Jones Day.

Plaintiffs will continue to be represented by co-counsel listed below. The withdrawal and substitution will not prejudice any party to this matter, and will not require the adjustment of any case deadlines. And this motion is unopposed.

WHEREFORE, Plaintiffs respectfully move this Court to enter an Order granting leave for Mr. Shumate to withdraw as counsel for Plaintiffs and granting the substitution of Mr. Dick as counsel for Plaintiffs.

Dated: January 16, 2025

Respectfully submitted,

/s/ Brett A. Shumate

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Noel J. Francisco  
(D.C. Bar No. 286666) (*pro hac vice*)  
Brett A. Shumate  
(D.C. Bar No. 974673) (*pro hac vice*)  
Anthony J. Dick  
(D.C. Bar No. 1015585)  
(*pro hac vice to be filed*)  
Charles E.T. Roberts  
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*Counsel for Plaintiffs*

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*Counsel for the Chamber of Commerce of the  
United States of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 16, 2025, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all attorneys of record by operation of the Court's electronic filing system.

/s/ Brett A. Shumate  
Brett A. Shumate